

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

| | | |
|-----------------------------------|---|----------------------------------|
| KIMBERLY GENEREUX, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | |
| COLUMBIA SUSSEX CORPORATION |) | |
| d/b/a WESTIN CASUARINA HOTEL, |) | |
| STARWOOD HOTELS & RESORTS |) | |
| WORLDWIDE, INC., WESTIN LICENSE |) | |
| COMPANY, WESTIN LICENSE |) | Civil Action No. 05-CV-10879-JLT |
| COMPANY NORTH, WESTIN |) | |
| MANAGEMENT COMPANY NORTH, |) | |
| INC., WESTIN MANAGEMENT |) | |
| COMPANY EAST, WESTIN NORTH |) | |
| AMERICA MANAGEMENT COMPANY, |) | |
| INC., GALLEON BEACH RESORT, LTD., |) | |
| and CORPORATE DEFENDANTS X1- |) | |
| 100, |) | |
| |) | |
| Defendants. |) | |
| |) | |

DEFENDANTS' LIST OF PERSONS THEY WISH TO DEPOSE IN THIS ACTION

Defendants Westin License Company (“Westin License Co.”) and Westin International Services, LLC, as successor by merger to Westin Management Company North, Westin Management Company East and Westin North America Management Company (“Westin L.P.”)(Westin License Co. and Westin L.P. will sometimes hereinafter collectively be referred to as the “Westin Defendants”), hereby identify the following persons and entities that they wish to depose in this action at this time:

1. Plaintiff Kimberly Genereux;
2. Columbia Sussex Corporation d/b/a Westin Casuarina Hotel;
3. Galleon Beach Resort, Ltd.;

4. Representatives and employees of Columbia Sessex Corporation d/b/a Westin Casuarina Hotel present at the scene at or about the time the incident that is the subject of this case occurred.

5. Representatives of the appropriate Cayman Island law enforcement authority, if any, that investigated the incident that is the subject of this case.

6. The proposed deponents identified in Section IV of the parties' Joint Statement Pursuant To Local Rule 16.1.

The Westin Defendants specifically reserve the right to notice the depositions of additional persons and/or entities as the litigation of this matter progresses or as more information becomes available during discovery.

WESTIN LICENSE COMPANY and WESTIN
INTERNATIONAL SERVICES, LLC, as
successor by merger to WESTIN
MANAGEMENT COMPANY NORTH,
WESTIN MANAGEMENT COMPANY EAST
and WESTIN NORTH AMERICA
MANAGEMENT COMPANY

By their attorneys,

/s/ Stephen C. Bazarian

Lynn Kappelman (BBO # 642017)
Stephen C. Bazarian (BBO # 553148)
Heidsha Sheldon (BBO #655263)
SEYFARTH SHAW LLP
World Trade Center East
Two Seaport Lane
Suite 300
Boston, MA 02210-2028
Telephone: (617) 946-4800
Telecopier: (617) 946-4801

Dated: May 12, 2006